

OCT 1 8 1984

CERTIFIED MAIL #0593507970
RETURN RECEIPT REQUESTED

Richard Sinise, Environmental Engineer
Monsanto Company
W.G. Krummrich Plant Terminal
Route 3
Joliet, Illinois 62701

Re: Monsanto Company
W.G. Krummrich Plant Terminal
ILD 000002702

Dear Mr. Sinise:

By now you should have received an acknowledgement of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR 270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility.

Enclosed is a copy of 40 CFR 270.14, which lists the items required for submitting the Part B permit application for the facility. The Part B application must be submitted in quadruplicate and postmarked no later than June 31, 1985. The original and one copy of the application must be sent to the U.S. Environmental Protection Agency (U.S. EPA) and the other two copies to the Illinois Environmental Protection Agency (IEPA). Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR 270.11(d) must accompany the application and all additional submittals. Send your application to the following addresses:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. box A3987
Chicago, Illinois 60690-3587

Larry Eastep, Manager
Permit Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently, I suggest you contact Mr. Gale Hruska, of my staff, at (312) 826-0989, as you begin preparing your application. Mr. Hruska will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

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IEPA-DLPC

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR §270.10.

Information in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. All incoming materials containing confidential business information should be sent in a double envelope--one envelope inside the other. The inner envelope is to be addressed to the docket control officer (DCO) with the following instructions: "to be opened only by the DCO." U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and may later request substantiation of such claims. Please review these rules carefully before making a claim.

If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed parts of 40 CFR Part 264, which include technical standards for the operation of treatment, storage, and land disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of our "Guidance For Permit Application Preparation" and "Part B Completeness Checklist" are also enclosed, which will help you in preparing a comprehensive and complete permit application.

We will coordinate review of the application with the IEPA, and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the IEPA, in lieu of the U.S. EPA, will make the final determination on your permit application.

We look forward to receiving your Part B permit application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 270
40 CFR 264
Guidance For Permit Application Preparation
Part B Completeness Checklist

cc: Robert Kuykendall, IEPA
C. Preston Cunningham, Managing Director